

June 3, 2004

**Operator Certification Determination for Combined Nuclear Medicine  
Technology Imaging/Radiologic Technology Imaging Devices**

**TO: Users of Combined Nuclear Medicine Technology  
Imaging/Radiologic Technology Imaging Devices**

**SUBJECT: RADIATION SAFETY ADVISORY 00-1**

The California Health and Safety Code and relevant regulations define nuclear medicine technology and radiologic technology and the certification requirements for persons engaging in each. The Department of Health Services (Department) issues this Advisory on an interim basis, which will remain in effect until regulations are adopted that provide similar or stronger protection of a patient's health and safety.

New technology exists that combines a nuclear medicine technology imaging device and a radiologic technology imaging device into one unit. In some commercial models, each imaging modality may be used separately.

The Department has therefore made a determination regarding which certification the individual operating these dual imaging devices must hold with the Department.

When a unit is operated **as a nuclear medicine imaging device**, the individual operating the machine must be certified as a nuclear medicine technologist operating under the supervision of a physician user named on the appropriate radioactive materials license.

When the unit is operated as a **dual imaging device**, it constitutes a nuclear medicine technology procedure, rather than a radiologic technology procedure. This determination is made because these situations include:

- **The injection of radiopharmaceuticals;**
- **The device may use radioactive material as point sources for transmission scanning and attenuation correction;**
- **The procedure involves the greater potential for radiation safety problems including dose to the patient, contamination of areas, dose to personnel and the public.**

Therefore, the nuclear medicine technologist is adequately certified to perform the study and operate the device in the dual mode.

When the unit is operated **as a radiologic technology imaging device**, the individual operating the machine must be a certified Radiologic Technologist working under the supervision of a certified Supervisor and Operator.

The selection of the site to locate the machine may be limited by size, configuration and space consideration in a facility. The Department, however, requires that the machine be located in an area under the control and authority of Nuclear Medicine and the Radiation Safety Officer named on the institution's radioactive materials license. This ensures that the Nuclear Medicine staff may secure, survey and restrict the area for contamination control and radiation protection concerns.